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NATIONAL ASSOCIATION for the EDUCATION of YOUNG CHILDREN

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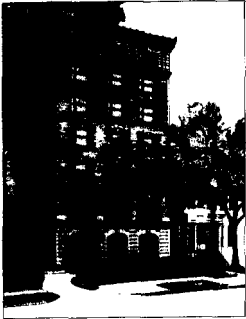
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Please note:

This package includes one original and nine copies of revised comments to the FCC by the National Association for the Education of Young Children (NAEYC), the enclosed comments and attached position statements replace the set of comments that was delivered to the Commission on April 23rd.

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May 5, 1993

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**To: Members of the Federal Communications Commission
1919 M Street, NW
Washington, DC 20554**

**Re: Comments submitted by the National Association for the
Education of Young Children on policies and rules concerning
children's television programming, MM Docket No. 93-48**

As the nation's largest organization working on behalf of young children, with more than 85,000 members, the National Association for the Education of Young Children applauds the FCC for seeking comments as to how its rules and policies might be revised to more clearly identify the levels and types of programming needed to adequately serve the educational and informational needs of children. Because NAEYC's mission addresses the early childhood years from

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These distinct age groups (or finer differentiations if possible) should be reflected in the development and review of licensees' statements of purpose as well as any FCC-developed guidance materials or standards related to meeting the obligations under CTA.

While we would support the development of specific guidance standards, we believe that other evidence should also be considered in reviewing how stations are fulfilling their obligations under CTA. We strongly support the concepts to which the inquiry refers, namely

- regularly-scheduled
- standard length programming
- *explicitly* designed to serve as an educational or informational purpose with entertainment as a secondary function, not vice versa.

NAEYC supports the adoption of staff processing guidelines that stipulate a baseline for "core" programming. Given diversity of needs of different viewers, careful consideration is necessary. For example, 1/2 hour for toddlers does little to meet teen needs. Meeting each group's needs with 1 hour per week leaves 20 minutes per week for each of 3 age groups—an outcome not in keeping with the concept of regularly scheduled, full-length programming. In keeping with the concept of a regularly scheduled, standard-length core, we would suggest a minimum baseline of 2-1/2 hours per week for each of the three age groups—preschool, elementary, and school-age (1/2 hour per weekday and one hour during the weekend). Ideally, we believe that a minimum of 1/2 hour per day of a regularly scheduled program with an explicitly educational or informational purpose should be available for preschool viewers; similarly 1/2 hour per day (scheduled after regular school hours) should also be available both for elementary viewers and teen viewers.

In addition, we suggest that the criteria might include evidence of systematic input from parents, early childhood teachers and other service providers, public school teachers and administrators, pediatricians, youth service organizations, and other agencies or organizations concerned with children's and family issues. Examples of such evidence include an advisory panel or focus groups to provide community input and guidance or active community involvement with children's services and projects.

In addition to considering the different age-related educational and informational needs of children, we believe that adequately serving these needs requires attention to specific circumstances and contexts of children's lives. For example, in the two weeks preceding the submission of these comments, television

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newscasts were dominated by stories of a random killer stalking the streets of Washington, DC, the Waco standoff and its fiery ending resulting in the deaths of numerous children as well as adults, fears of riots in Los Angeles in the aftermath of verdicts in the cases of officers charged with violating Rodney King's civil rights, and a prison siege in Ohio. Certainly, we believe television stations are obligated to fully report each of these violent stories. But, we must also realize the effects of such violence on children and to provide specific opportunities to counter the violence.

While the CTA was not specifically designed to address media violence, we cannot help but note that violence—whether on the news or the gratuitous violence that is so prevalent in many children's programs—*undermines* efforts to serve children's educational and informational needs. Any time that is specifically devoted to serving children's educational and informational needs is that much time that is *not* devoted to violence. The research on the deleterious effects of media violence (see NAEYC position statement on media violence, attached) is clear. If we are to truly address the educational and informational needs of children, we must help them deal with the violence in their lives and also reduce it. Perhaps the easiest violence to deal with the gratuitous violence so prevalent in cartoons primarily geared toward child audiences.

The Commission's inquiry also sought comments regarding a shortage of appropriate programming for children. NAEYC supports full funding of measures such as the Ready To Learn Television Act that provides funds to encourage the development of appropriate programming. We also believe that a strong signal from the FCC regarding the intent to vigorously enforce the CTA will help stimulate additional interest and support for such programs.

NAEYC Position Statement on Media Violence in Children's Lives

Adopted April 1990

During the past decade, America has witnessed an alarming increase in the incidence of violence in the lives of children. On a daily basis, children in America are victims of violence, as witnesses to violent acts in their homes or communities, or as victims of abuse, neglect, or personal assault. The causes of violent behavior in society are complex and interrelated. Among the significant contributors are poverty, racism, unemployment, illegal drugs, inadequate or abusive parenting practices, and real-life adult models of violent problem-solving behavior. NAEYC, the nation's largest organization of early childhood professionals, is deeply concerned about the destructive effect of violent living conditions and experiences on many of our nation's children.

At the same time that there has been an increase in the number of reported violent acts directed at children, there has been an increase in the amount and severity of violent acts observed by children through the media, including television, movies, computer games, and videotapes, and an increase in the manufacture and distribution of weapon-like toys and other products directly linked to violent programming. NAEYC believes the trend toward increased depiction of violence in the media jeopardizes the healthy development of significant numbers of our nation's children.

In response, NAEYC's Governing Board appointed a panel of experts to guide the development of initiatives and resources to assist teachers and parents in confronting the issue of violence in the lives of children. This position statement addresses one aspect of the problem—media violence—and is the first in a series of projects the Association plans to address this important issue. We have chosen to address the issue of media violence first because, of all the sources and manifestations of violence in children's lives, it is perhaps the most easily corrected. The media industry ought to serve the public interest and ought to be subject to government regulation.

Statement of the position

NAEYC condemns violent television programming, movies, videotapes, computer games, and other forms of media directed to children. NAEYC believes that it is the responsibility of adults and of public policy to protect children from unnecessary and potentially harmful exposure to violence through the media and to protect children from television content and advertising practices that exploit their special vulnerability (Huston, Watkins, & Kunkel, 1989). NAEYC believes that television and other media have the potential to be very effective educational tools for children. Research demonstrates that television viewing is a highly complex, cognitive activity, during which children are actively involved in learning (Anderson & Collins, 1988). Therefore, NAEYC supports efforts to use media constructively to expand children's knowledge and promote the development of positive social values. NAEYC also supports measures that can be taken by responsible adults to limit children's exposure to violence through the media. Such efforts include but are not limited to:

- legislation requiring reinstatement of guidelines for children's television by the Federal Communication Commission, including requirements for videotapes and elimination of television programs linked to toys
- legislation limiting advertising on children's programming, and standards for toys to ensure that they are not only physically safe, but also psychologically safe
- legislation enabling the development of voluntary television-industry standards to alleviate violence in programming, specifically exempting such efforts from anti-trust regulation
- promotion of more developmentally appropriate, educational programming that meets children's diverse needs for information, entertainment, aesthetic ap-

preciation, positive role models, and knowledge about the world (Huston et al., 1989)

- development and dissemination of curriculum for teachers to improve children's critical viewing skills and to teach nonviolent strategies for resolving conflicts
- development of resources to assist parents in the constructive and educational use of media with their children

During early childhood, the foundation is laid for future social, emotional, cognitive, and physical development. During this formative period, young children are particularly vulnerable to negative influences. In most instances, children have no control over the environmental messages they receive. Up until age seven or eight, children have great difficulty distinguishing fantasy from reality and their ability to comprehend nuances of behavior, motivation, or moral complexity is limited. This special vulnerability of children necessitates increased vigilance to protect them from potentially negative influences. Parents are ultimately responsible for monitoring their children's viewing habits; however, parents cannot be omniscient and omnipresent in their children's lives. Parents need assistance in protecting their children from unhealthy exposure to violence. Therefore, limits must be placed on the content of programming directed at children. Restricting violence in children's programming should not be considered censorship, any more than is protecting children from exposure to pornography (Carlsson-Paige & Levin, 1990). Likewise, industry standards to limit violence in children's programming should be developed as action taken in the public interest.

Rationale

This position statement is based on research examining the amount of violence present in the media as well as the effect of exposure to violent programming on children's development. Data clearly indicate that violence in the media has increased since 1980 and continues to increase. In addition, there is clear evidence to support the negative impact of viewing violence on children's development.

How violent are the media for children?

The problem of violence in the media is not new, but has become much worse since the Federal Communication Commission's decision to deregulate children's commercial television in 1982. For example, air time for war cartoons jumped from 1½ hours per week in 1982 to 43 hours per week in 1986 (Carlsson-Paige & Levin, 1987; Tuscherer, 1988). Children's programs featured

18.6 violent acts per hour a decade ago and now have about 26.4 violent acts each hour (Gerbner, 1990). Adults need to recognize that the content of programming has changed, and as a result the potential for negative effects on children's development is greater. Next to the family, television and other media may be the most important sources of information for children, rivaling the school as a principal factor influencing their development.

How do violent media affect children's development?

Research consistently identifies three problems associated with heavy viewing of television violence: Children may become less sensitive to the pain and suffering of others; they may become more fearful of the world around them; and they may be more likely to behave in aggressive or harmful ways toward others (National Institute of Mental Health, 1982; Singer & Singer, 1984, 1986; Singer, Singer & Rapaczynski, 1984; Rule & Ferguson, 1986; Simon, 1989). Exposure to media violence leads children to see violence as a normal response to stress and as an acceptable means for resolving conflict.

Of great concern to early childhood educators is the negative effect of viewing violent programs on children's play. The importance of children's imaginative play to their cognitive and language development is well documented (Piaget, 1962, 1963; Johnson, Christie, & Yawkey, 1987). Research demonstrates that watching violent programs is related to less imaginative play and more imitative play in which the child simply mimics the aggressive acts observed on television (NIMH, 1982). In addition, many media productions that regularly depict violence also promote program-based toys, which encourage children to imitate and reproduce in their play the actual behaviors seen on television or in movies. In these situations, children's creative and imaginative play is undermined, thus robbing children of the benefits of play for their development (Carlsson-Paige & Levin, 1990). In their play, children imitate those characters reinforced for their aggressive behavior and rehearse the characters' scripts without creative or reflective thought. Children who repeatedly observe violent or aggressive problem-solving behavior in the media tend to rehearse what they see in their play and imitate those behaviors in real-life encounters (Huesmann, 1986; Rule & Ferguson, 1986; Eron & Huesmann, 1987). In short, children who are frequent viewers of media violence learn that aggression is a successful and acceptable way to achieve goals and solve problems; they are less likely to benefit from creative, imaginative play as the natural means to express feelings, overcome anger, and gain self-control.

Recommendations

What should policymakers and broadcasters do?

NAEYC supports the reinstitution of FCC standards establishing limits on violent depictions during hours children are likely to watch television. Standards would also control the degree to which violence is depicted so as to be perceived by children as a normal and acceptable response to problems, as equated with power, as leading to reward or glorification of the perpetrator. An additional strategy would be to develop a parental guidance rating system for network and cable television, videotapes, and computer games similar to that established for movies.

NAEYC further supports the reestablishment of industry standards to limit children's exposure to violence. The self-regulating code of the National Association of Broadcasters (1980) was a responsible position of the television industry toward young children. As an immediate action, laws prohibiting the adoption of such voluntary standards as violations of anti-trust regulation should be repealed.

Industry standards should also limit advertising during children's programming in recognition of children's inability to distinguish the advertising from pro-

tion on the quality of children's television has made it necessary for teachers and parents to be more vigilant than they would have to be if the government and television industry acted more responsibly toward children.

Teachers can work with children when themes of television violence appear in their play to facilitate more appropriate problem solving and/or creative, imaginative play. Teachers should inform parents when negative or violent themes appear as a regular part of their children's play and support parents in their efforts to monitor children's viewing habits.

As professionals, early childhood educators should share their knowledge of child development and the effects of violent media viewing with legislators and sponsors of children's programming. It is the professional responsibility of early childhood educators to advocate for more developmentally and educationally appropriate programming for children. Teachers need to recognize that media are also a powerful teacher that can and should be used constructively with children. Contrary to popular belief, television viewing is not a passive activity; children are mentally active during television viewing (Anderson & Collins, 1988). The use of media as an educational tool should not be rejected because much of commercial television currently lacks educational value or promotes violence.

vision; the other 90% is spent watching programs designed for adults (Van Dyck, 1983). Parents can assist children in finding alternatives to viewing adult television. In addition, parents can use videotapes of high-quality children's programming and public television when commercial alternatives are not available.

As consumers, parents should recognize and use their influence with sponsors of children's programs. The primary purpose of commercial television is not to entertain or to educate but to sell products. Parents can communicate with advertisers on programs that are valuable, as well as sponsors of programs that are violent. Parents can also help their children become educated consumers and involve them in writing complaints to broadcasters and companies that use violent images in an attempt to sell toys and other products. As taxpayers, parents can encourage their legislators to adopt policies to protect children from media violence.

Conclusion

The prevalence of violence in American society is a complex social problem that will not be easily solved. Violence in the media is only one manifestation of the larger society's fascination with violence. However, media violence is not just a reflection of a violent society, it is also a contributor. If our nation wishes to produce future generations of productive adults who reject violence as a means of problem solving, we must reassert the vital role of government in protecting its most vulnerable citizens and, together, work to make media part of the solution.

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